#### GARDNER REDEVELOPMENT AUTHORITY

### 115 Pleasant Street, Manca Annex-Room 201 Gardner, MA 01440

Phone: 978-630-4014 Fax: 978-632-1905

- 1. <u>Applicant Identification:</u> The Gardner Redevelopment Authority 115 Pleasant Street Gardner, Ma 01440.
- 2. Federal Funds Requested:
- a. Grant Type "Single Site Cleanup"
- b. <u>Federal Funds Requested:</u> i. \$200,000 ii. The GRA will not be requesting a cost share waiver.
- c. Contamination: "Petroleum"
- 3. Location: Gardner, Worcester County, Massachusetts
- 4. Property Information: 140 South Main Street, Gardner, Massachusetts 01440
- 5. Contacts:
- a. Project Director

**Economic Development Coordinator** 

Maribel Cruz

978-630-4074 ext. 1

#### mcruz@gardner-ma.gov

115 Pleasant Street Gardner, MA 01440

b. Chief Executive:

Executive Director of the Gardner Redevelopment Authority

Trevor Beauregard

978-630-4014

tbeauregard@gardner-ma.gov

115Pleasant Street Gardner, Ma 01440

6. <u>Population</u>: The City of Gardner, Massachusetts per <u>www.census.gov</u> 2018 has a population of 20,719.

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7. Other Factors Checklist Please identify which of the below items apply to your community/proposed project. If none of the Other Factors are applicable to your community/proposed project, please provide a statement to that effect.

Other Factors	Page #
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them.	2
The proposed site(s) is in a federally designated flood plains.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	2

#### 8. <u>Letter from the State or Tribal Environmental Authority</u>

Attached are two letters from Angela Gallagher Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup. First being the State Petroleum Eligibility Determination and second being the State Letter of Acknowledgement. These letters acknowledge that the Gardner Redevelopment Authority plans to conduct cleanup activities at 140 South Main Street Gardner, Ma 01440 and is applying for FY20 federal brownfields grant funds.



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

# Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker Governor

Karyn E. Polito Lieutenant Governor Kathleen A. Theoharides Secretary

> Martin Suuberg Commissioner

October 15, 2019

U.S. EPA New England Attn: Frank Gardner 5 Post Office Square, Suite 100 Mail Code: OSRR07-3 Boston, MA 02109-3912

RE: STATE LETTER OF ACKNOWLEDGMENT

Gardner Redevelopment Authority, Application for EPA Cleanup Grant Funds

Dear Mr. Gardner:

I am writing to support the proposal submitted by the Gardner Redevelopment Authority (GRA) under the Fiscal Year 2020 U.S. Environmental Protection Agency (EPA) Brownfield Cleanup Grant Program. The GRA is seeking funding to conduct further cleanup of the property located at 140 South Main Street in Gardner, Massachusetts, which the GRA owns. The GRA and the City of Gardner (City), which formerly owned the property, have a history of successfully redeveloping Brownfields sites following assessment, including the locations of a recent project relative to the new Gardner Police Department (200 Main Street) and the earlier phase of petroleum cleanup recently concluded at 140 South Main Street, which is a former oil distributor. The GRA's ongoing efforts to remediate this contaminated property will be greatly strengthened through funding from EPA.

In Massachusetts, state and federal agencies have developed strong partnerships and work together to ensure that parties undertaking Brownfield projects have access to available incentives. The Massachusetts Department of Environmental Protection (MassDEP), through our regional offices, provides technical support to Brownfield project proponents when regulatory issues arise. If this proposal is selected, MassDEP will work with our state and federal partners to provide the support to GRA that will be needed to help make this project a success.

We greatly appreciate EPA's continued support of Brownfield efforts here in Massachusetts.

Sincerely,

Paul Locke

Assistant Commissioner, Bureau of Waste Site Cleanup

ec: Trevor Beauregard, Executive Director, Gardner Redevelopment Authority

Maribel Cruz, Economic Development Coordinator, Gardner Redevelopment Authority

Mike LeBlanc, Brownfields Coordinator, MassDEP Central Regional Office

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

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### 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area: Gardner was originally established as a town in 1785, and later incorporated as a City in 1923. Gardner was home to twelve furniture manufacturing facilities which produced over 1.2 million chairs annually and by 1910, had witnessed a surge in manufacturing with twenty major chair manufacturers producing over 4 million chairs each year. Gardner earned international recognition and was dubbed as the "Chair City of the World" now simply The Chair City. These industrial manufacturing sites were often located in neighborhoods within very close proximity to residences due to lack of transportation. These sites produced materials, finished products and or supported furniture making as machine and tool shops. During the past fifty years, these manufacturing companies have closed or relocated. The decline of this industrial period has left Gardner a legacy of vacant, underutilized facilities that are not conducive to modern manufacturing. As a result the City was left with numerous contaminated sites surrounded by residential neighborhoods. The large mill buildings that once accommodated furniture manufacturing now serve a variety of uses, including retail furniture outlets, offices and apartments, but many are dilapidated and vacant, particularly above the ground floor. The last remaining major furniture manufacturer, Nichols & Stone, Inc., filed for bankruptcy in 2007 and closed, ending a 200-year period of furniture manufacturing in the City. The blight caused by our former industrial mill sites has been especially acute and continues to have a significant impact on the city's community life. While the City has a population of 20,718(per the U.S. Census) this problem continues to create a barrier to economic development and posing a threat to human health and the environment due to high cost of assessment and remediation. Through public forum and discussion the City identified the urgent need to assess and redevelop these blighted areas. This resulted in the creation of the Urban Renewal Area in the Mill Street Corridor (MSC), known as the Mill Street Urban Renewal Plan (MSURP). This application focuses on remediation of a Brownfield site in close proximity to this corridor known by its address, 140 South Main Street.

ii. Description of the Brownfield Site: From 1949 to 1980 the site hosted a livery and gas/ service station, through the 1980's it housed the Bolster Oil Company and in the 1990's was home to Mailman's Steam Carpet Cleaning. From the early 2000's to 2009 it was occupied by an auto repair business. Bolster reportedly distributed fuel oil, gasoline, kerosene and lubricating oil. In 1986 11 underground storage tanks and an undisclosed number of aboveground storage tanks were removed from the site. The Site is contaminated by Petroleum substances. In general, the site buildings have concrete slab floors with floor drains that flow to the river. In the front forecourt of the site was a fuel dispenser island as well as elevated above ground storage tanks that were utilized for fuel dispensation. The site is bounded by residential properties to the north and west, a river to the south, and South Main Street to the east. Prior to remediation work performed following a July 2014 Release Abatement Measure (RAM) plan the garage to the south of the property and a hydraulic lift were demolished and removed. Under the RAM plan, 900 tons of petroleum-impacted soil was removed. Monitoring wells installed in 2016 have shown continued elevated petroleum levels in groundwater. A simple visual inspection of the surrounding body of water shows the presence of contamination. The

retaining wall along Greenwood Brook is also a concern to the potential re-use of the site and its effects on soil remediation surrounding the structure. Environmental concerns focus on the soil and water impacts to future use of the site as well as health and habitat issues for humans and wildlife that come into contact with the site. The property is currently improved by two single-story buildings consisting of multi-room office area with attached garage. A separate garage on the southern portion of the site, was demolished in an earlier phase of remediation. A 13 ft. high retaining wall is located along the southern/eastern boundary of the site, separating the site from Greenwood Brook. The remainder of the site is open vegetated land. Wetlands associated with Greenwood Brook and designated 100-year floodplain areas are located within 500 feet of the site. This brook feeds into the Otter River Watershed which in turn feeds the Millers River and ultimately Connecticut waterways. There is a two family home that directly abuts the property on the west side and a single family home that abuts the property on the north side of the property.

#### b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans: Since taking ownership of the site in 2012 the GRA has been approached by multiple local prospects interested in making commercial use of the site. The GRA's reuse strategy is to market the site during remediation, and to raise awareness and prospect interest. While partnering with the City the commercial 2 zoning will continue to be the same and recommend the prospect incorporate energy efficiency measures in the redevelopment of the site. A completed and thorough remediation of contamination would ensure optimal use of the site while improving habitat for Greenwood Brook and the waterways downstream that flow into the Otter River. Occupation of the site by a successful small business will immediately improve economic development and reduce safety risks to the abutters and to the South Gardner Neighborhood. Current prospects have the potential to sustain 3-10 jobs including the entrepreneur starting the enterprise. This remediation project and the other private improvements being made in South Gardner, coupled with work being done within the Mill Street Corridor Urban Renewal Area immediately to the southwest will dramatically improve access to the area, while eliminating exposure to harmful contamination. Improving the embankment of Greenwood Brook and ensuring no further petroleum contamination effects the waterway will create more attractive siting for South Gardner while reducing pollution entering the Otter River/Millers River/ Connecticut River waterways downstream that affect a significant population of people and wildlife. The revitalization of 140 South Main Street fits into the overall community vision.

<u>ii. Outcomes and Benefits of Reuse Strategy:</u> The proposed project along with revitalization plans will substantially stimulate economic development in the target area. The economic benefits include, increased employment, expanded tax base, and increased property values. All which are part of the economic benefits of the reuse strategy. Although not directly in an Opportunity zone the redevelopment of the site will spur economic growth in the Opportunity zone which is in close proximity. The reuse of the proposed site will incorporate energy efficiency measures such as Insulation, ventilation of air exchange, wireless building temperature controls, indoor and outdoor LED lighting, and instant energy saving measures.

#### c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse: The GRA has been awarded a grant from Massdevelopment for the 140 South Main Street site. The grant total is for \$350 thousand dollars (\$100k for Assessment and \$250k for Cleanup). The current grant funds are in place as of September 2019, which assessment funds are already being utilized. Come early spring the contract work will be set to bid and the cleanup portions of the funds will begin to be utilized. The EPA funding will increase the availability of additional funds for environmental remediation, and subsequent reuse of the proposed site. Key funding resources that have been secured for the remediation and reuse strategy are the Gardner Redevelopment Authority and The City of Gardner CDBG funding.

<u>ii. Use of Existing Infrastructure:</u> This grant will facilitate the use of existing infrastructure for the 140 South Main Street site. The site already has existing infrastructure in place.

#### 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

#### a. Community Need

#### i. The Community's Need for funding

The grant will meet the needs of the community which has an inability to draw on other initial sources of funding to carry out environmental remediation and subsequent reuse of the target area because of the small population and low income of the community. The statistics relative to unemployment, poverty, and median household income further highlight a community in dire need of funding assistance to promote economic development through brownfield remediation and redevelopment.

#### ii. Threats to Sensitive Populations

- (1) <u>Health or Welfare of Sensitive Populations</u>: The existence of abandoned industrial Brownfield's in this low income neighborhood has resulted in a potentially elevated threat to human health. The cleanup and redevelopment of the site is intended to be a likely catalyst for overall neighborhood redevelopment efforts that will result in safer housing and reduced exposures to hazardous materials which threaten adults and children alike.
- (2) <u>Greater Than Normal Incidence of Disease and Adverse Health Conditions:</u>
  The severity of health and welfare issues experienced by the sensitive population include the data from the Comprehensive Community Health Assessment. Based on the assessment, Gardner has a significantly higher incident of poor health, mental illness and mortality rates compared with the State. The premature mortality rate is 42% higher than the Massachusetts average. The death rate associated with cancer is 23%, with lung cancer 49%, and breast cancer being 30% higher than the state average. The coronary heart disease mortality rate, is 47% higher than the state average. Research has shown

that these statistics traditionally reflect the social characteristics of long term exposure to vacant and underutilized industrial properties that have some type of petroleum contamination. This grant will provide the additional funding needed to completely address and facilitate the removal of the contamination threat.

(3) Disproportionately Impacted Populations: The assessment of the demographics referenced above within older industrial communities, where residential homes and industrial sites comingle with neighborhoods presents linkages to environmental justice issues. 140 South Main shares the negative environmental consequences resulting from industrial, and/or commercial operations. The cleanup of this site will represents a significant opportunity for the City of Gardner to improve quality of life and economic opportunity while preserving the environment for future generations.

#### b. Community Engagement

#### i. Project Partners

The GRA has many partners within the City, among those are the Mayor, Gardner Chamber of Commerce, NewVue Communities, and Montachusett Regional Planning Commission. MRPC provides technical planning assistance and carries out comprehensive planning in the central Massachusetts region. (MRPC) has provided funding for assessment in 2018 of (\$40K). NewVue Communities is a non-profit agency that promotes self - sufficiency by creating affordable housing opportunities, business startup planning, and providing additional programs that raise economic, educational, and social levels of Gardner residents. NewVue continues to commit to the City's program by identifying opportunities of redevelopment and proposed locations for assessment and remediation.

#### ii. Project Partner Roles

Partner name	Point of contact (name, email, & phone)	Specific role in the project
Mayor City of Gardner	Mark Hawke	Advocating at the state and federal level and providing support.
Montachusett Regional Planning Commission	John Hume	Identified the project in the Comprehensive Economic Development Strategy and provided assessment funding.  MRPC will host public meetings as well.
NewVue Communities	Marc Dohan	Provides technical assistance and proposed assessment and remediation of the site.
Gardner Chamber of Commerce	Carol Jacobson	Assisting the City with marketing development efforts to members and

potential stakeholders while providing key links to the business community for program participation and potential reuse of industrial, brownfield, and commercial
sites.

iii. Incorporating Community Input: Through the Gardner Brownfields Steering Committee (BSC) the City has a formal outreach program to promote and discuss 140 South Main Street site cleanup and reuse planning. The effort, in cooperation with local community partners, includes an educational component to keep local businesses and residents better informed about the site and impacts of brownfields in general. This outreach is to include information dissemination via the City's Economic Development brownfields website. The development of regular press releases describing current and upcoming activity, distribution of informational pamphlets to the public through community partners, speaking engagements in public settings, in social events, and through necessary public hearings. This will keep channels of communication open between residents in affected areas. The Project Director is to develop outreach materials, website content, conduct outreach through partner agencies and public workshops. This will keep channels of communication open between residents in affected the areas. This communication style is consistent with the process that has continued through the pre-remediation process

#### 3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: The proposed draft for cleanup activities includes the removal of the retaining wall/former garage foundation, to conduct additional contaminated soil excavation at depths near and below groundwater table (specifically nearer to and up to the bank of Greenwood Brook) for off-site disposal. Additional action will include the removal of Light Non Aqueous Phase Liquid (LNAPL) in groundwater and to complete the restoration of the riverbank. Included within this activity will be the personnel needed for reporting and project update. To pursue regulatory closure without added restrictions on the property (no Activity and Use Limitation), the measurable LNAPL in on-site wells must be eliminated. Approaches to LNAPL removal at this site would include additional soil excavation in the area of the retaining wall. Since the retaining wall is no longer considered a load bearing, functional retaining wall, sections of the wall will be removed to allow for soil excavation and the area could be restored by grading the site down towards Greenwood Brook. During this proposed option, LNAPL will be pumped out during the dewatering of the excavation area, and the free-phased product will also be disposed off-site. Also during this proposed option, the residual petroleum impacted soil along the Greenwood Brook bank will also be excavated as necessary. Elimination of all measurable LNAPL in on-site wells. Complete additional soil excavation in the area of the retaining wall to eliminate soil contamination. Remove sections of the wall to allow soil excavation and restore the embankment to habitat by grading down towards the waterline. Ensure that all soils contaminated on site are excavated and disposed of off-site. The successful

redevelopment of 140 South Main Street as small business. An increase in entrepreneurial interest in the South Gardner Neighborhood. An increase to small business employment in the South Gardner Neighborhood. The successful use of habitat by wildlife along Greenwood Brook. The elimination of public health, safety and environmental issues stemming from the site. The project will be measured through analysis by the Licensed Site Professional, Project Manager, other relevant municipal staff with final approval and input by the GRA board and additional oversight by MADEP and EPA. All information collected as part of analysis will be carefully weighed for efficacy and archived for easy reference.

#### b. Description of Tasks/Activities and Outputs:

#### Task/Activity:

- i. Project Implementation: Procuring a Qualified Environmental Professional, submitting and obtaining approval of Qualified Assurance Project Plan, enrollment of site in the State Voluntary Cleanup Program, certifying cleanup is complete, coordination with the local health agency on health monitoring activities.
- Discussion of EPA-funded activities: preparing QAPP, State required documentation, Procuring a cleanup contractor, other cleanup activities that are needed to accomplish project goals.
- Non-EPA grant resources needed to carry out task/activity, if applicable:
- ii. Anticipated Project Schedule: 3 years or less
- iii. Task/Activity Lead(s): Gardner Redevelopment Authority Project Manager and Qualified environmental professional.
- iv. Output(s): Quarterly reports, Cleanup Plans, Community Involvement Plans, Final ABCA, Administrative Records, and Cleanup Completion Reports.

#### i.Project Implementation:

Procuring a Qualified Environmental Professional, Submitting and obtaining approval of Qualified Assurance Project Plan, enrollment of the site in the State Voluntary Cleanup Program, certifying cleanup is complete, coordination with city board of health for health monitoring activities. The plan addresses the proposed site and the GRA's readiness to achieve the project goals in an efficient manner. MassDevelopment funding, and in kind resources from the cities DPW will bridge the gap between the EPA grant and activities necessary to bring the grant to successful completion.

<u>ii.</u> Anticipated Project Schedule: The project schedule milestones are achievable, due to the project being already underway with MassDevelopment funding. Assessment has already begun and come spring 2020 the Project Director and QEP will be procuring a cleanup contractor. With EPA funding the project will be finalized within the 3 year performance period.

<u>iii. Task/Activity Lead:</u> The Project Director (Maribel Cruz) is also the City of Gardner's Economic Development Coordinator, which has successfully completed EPA grant reporting and closing of the Garbose Metal Facility cleanup project. The PD has also closed out the EPA/RLF for the City of Gardner demonstrating capability to direct grant activities. The cities local health department is involved in health monitoring activities for this brownfield site.

<u>iv. Outputs</u>: The specific outputs are as follows: Cleanup plans, community involvement plan, final ABCA documents, administrative records, Release Abatement Measure plan and cleanup completion report. Being that the assessment for the project is already underway and planning is in place for startup cleanup activities the project outputs will be closed within the 3 year period of performance.

#### c. Cost Estimates

Direct	Project Task (\$)								
Costs	Budget Categories	Task 1	Task 2	Task 3	Task 4	Total			
	Personnel		L			3,600.00			
	Fringe Benefits								
	Travel <sup>1</sup>					2,500.00			
	Equipment <sup>2</sup>								
	Supplies					2,500.00			
	Contractual	_				191,400			
	Other (include sub awards)								
	Specify type								
	Total Direct Costs <sup>3</sup>					200,000			
	Indirect Costs <sup>3</sup>					11.00			
	Total Federal Funding( not to exceed \$500,000)					200,000			
	Cost Share (20% of requested federal funds)					40,000			
	Total Budget (total Direct costs plus Indirect costs plus					240,000			
	cost share)	<u></u>							
	1 Travel to brownfields-related training conference 2 EPA defines equipment as items that cost \$5,000.				_				

<sup>2</sup> EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year, Items costing less than \$5,000 are considered supplies. Generally, equipment is not required for Brownfield Grants.

<sup>3</sup> Administrative costs (direct and/or indirect) for the Cleanup Grant applicant itself cannot exceed 5% of the total EPA-requested funds.

<sup>4</sup> Applicants must include the cost share in the budget even if applying for a cost share waiver (see Section III.B.13. for a list of applicants that may request a cost share waiver). If the applicant is successful and the cost share waiver is approved, it will be removed in pre-award negotiation.

#### i. Development of Cost Estimates:

The personnel costs are \$3,600.00 for the Project Manager (\$30.00 an hour X 120 hours over 3 year period= \$3,600.00. Personnel costs- Cost share Employee City Salary= city funds. Travel costs- EPA Conference depending on location, lodging, airfare, per diem total estimated \$2,500. Supplies – \$2,500 Laptop and Camera to log, track and photograph documentation of project. Contractual- \$191,400.00 referred to QEP regarding the remediation Planning, wetland permitting support, structural elevation, MCP compliance, environmental specialist, remediation work.

<u>ii. Application of Cost Estimates:</u> Each cost is reasonable and realistic to implement the project and clearly correlates with the proposed tasks and activities. With the EPA funding the petroleum substance found at the site will be completely eliminated and the site will be ready for redevelopment and reuse. All petroleum funds will be expended to complete this project.

<u>iii.</u> Eligibility of Cost Share Activities: The cost share will be met with in kind services by the City of Gardner Police, DPW assistance supplies, and personnel time to manage the grant. The GRA has received a grant from MassDevelopment that will also be used as cost share. The entire cost share will be met with these eligible activities and funding.

d. Measuring Environmental Results: The project director will track the project using ACRES, quarterly reporting and collaborating with the QEP to stay on track with work plans and project schedule. The PD will have weekly check-ins with the QEP and GRA Executive Director to track, measure and evaluate project progress. These actions are in place to achieve expected outputs, outcomes, and results which are reasonable and appropriate. Project goals will be met in a clear, efficient and concise manner.

#### 4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

#### a. Programmatic Capability

i. Organizational Structure: The organizational structure includes the Executive Director of the GRA who is also the City of Gardner's Economic Development Director, the Project Director is the City of Gardner's Economic Development Coordinator who will contract the Qualified Environmental Professional. The Budget Project Manager who sits in the community development office, will oversee the financial requirements of the grant. This group of qualified representatives will ensure the timely and successful expenditure of funds and completion of all technical, administrative and financial requirements of the project and grant within the 3-year period of performance.

#### ii. Description of Key Staff:

Trevor Beauregard, serves as the Director of the Department of Community Development and Planning and is also the Executive Director for the Gardner Redevelopment Authority. Mr. Beauregard brings over twenty three years of economic development to the City. Mr. Beauregard provides final approval on all payments and monitors the Project Director (PD)/Economic Development Coordinator (EDC) and other department personnel for compliance with programmatic requirements. Under the general direction of Mr. Beauregard, the project director will implement and administer all funded activities relative to the project.

Maribel Cruz, is the Economic Development Coordinator for the City of Gardner and will act as the Project Director for the project. Ms. Cruz brings over 18 years of Business Banking Management experience and 2 years construction project manager experience to the project. She has a proven track record for program development, business development and strategic planning to facilitate the project goals. Ms. Cruz will manage the project and also conduct outreach, marketing, steering committee coordination, contract oversight and submittal of all project reports via ACRES.

Katie Medina, Budget/Project manager has over eight years of experience with public/private sector financial management. Her duties require her review financial requirements of the project and ensure that invoices/payments are processed properly and in a timely fashion. Mrs. Medina will be working closely with the project director to ensure that project implementation is in compliance with programmatic and financial requirements along with monitoring the expenditure of grant funds through grant programs and submitting monthly reports to PD.

Qualified Environmental Professional, is used for technical assistance related to site assessment and remediation activities and for review of program participant applications, conducting Phase I,II, and III ESA's and cleanup planning, monitor and report on progress, and offer technical reports for quarterly submissions to PD. The QEP acts as a compliance monitor for the City to assure compliance with Massachusetts Contingency Plan. The City of Gardner has two QEP's under contract, one of these QEP's will be used for contract oversight.

i. Acquiring Additional Resources: The City's Department of Community
Development and Planning has successfully administered grant programs from a
variety of State and Federal sources. Since 1994, the DCDP has managed over \$23
million in grant funds, including over \$1.9 million in brownfield funding. The City
has successfully managed \$1.25 million in revolving loan funds, \$800,000 of
Brownfield Cleanup funds, and \$370,000 in assessment funds through local, state and
federal programs. The City personnel along with its contractual and community
partners, have the diverse experience to successfully establish, market, and manage
the brownfield project.

#### Threshold Criteria

Gardner Redevelopment Authority, Massachusetts FY20 EPA Cleanup Grant Application RFP No: EPA-OLEM-OBLR-19-07

- 1. <u>Applicant Eligibility</u>: The Gardner Redevelopment Authority an eligible entity, 115 Pleasant Street, Room 202 Gardner, MA 01440 is an independent economic development agency for the City of Gardner, in accordance with provisions of Massachusetts General Laws Chapter 121, as amended.
- 2. <u>Previously Awarded Cleanup Grants:</u> I affirm that the proposed site has not received a previous EPA Cleanup Grant.
- 3. <u>Site Ownership:</u> The Gardner Redevelopment Authority became the sole owner of the site, including specific parcel R17-18-11, via City Council vote to convey the property on April 13<sup>th</sup>, 2010.
- 4. <u>Basic Site</u>: Information: a) 140 South Main Street b) 140 South Main Street Gardner, MA 01440 c) The Gardner Redevelopment Authority is the current owner.
- 5. Status and History of Contamination at the site: a) 140 South Main Street is contaminated with Petroleum substances. b) Previous operational history includes Livery and Gas/service station, Bolster Oil Company, Mailman's Carpet Cleaning and finally an automotive repair business. The site is not used at this time. c) The environmental concern petroleum in the ground and seeping into adjacent Greenwood Brook. d) According to previous reports Bolster Oil, distributed petroleum products including gasoline, fuel oil, and kerosene, lubricating oil and used the property for automotive repair servicing. A combination of all the previous uses have contributed to the overall petroleum contamination of the site. The nature of the contamination is petroleum contamination and the extent is that is seeping into Greenwood Brook which is downstream of Wrights Reservoir.
- 6. <u>Brownfield Site Definition: a)</u> I affirm that the site is not listed on the National Priorities List b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued under CERLA and c) not subject to jurisdiction, custody, or control of the U.S. government.
- 7. Environmental Assessment Required for Cleanup Grant Applications: ASTM Phase I prepared for MASSDEP under Site Assessment Remediation Support Services program by watermark in January 2012, ABCA, Phase III Remedial Action plan prepared for the City of Gardner by Weston & Sampson in February 2013, Release Abatement Measure(RAM) Completion Report, prepared in May 2015, which was submitted to MASSDEP under site RTN:2-0729, Tier Classification report, prepared in May 2017, (Draft)Phase II Environmental Site Assessment Summary Report, prepared by TRC in July 2018.
- 8. Enforcement or Other Actions: To the best of my knowledge there aren't any ongoing or anticipated environmental enforcement actions for the site.
- 9. Sites requiring a Property Specific Determination: I affirm that the property does not need a property specific determination.
- 10. Threshold Criteria Related to CERLA/Petroleum Liability: a) exemption to CERLA Liability/ Tax Delinquency b. Property Ownership Eligibility- Petroleum Sites i. Information Required for a Petroleum Site Eligibility Determination

- 1. <u>Current and Immediate Past Owners</u>: Current owner is Gardner Redevelopment Authority. Past immediate owner was The City of Gardner who claimed the site for Tax Title. Petroleum contamination is present at the site due to former uses and are documented in MassDEP records.
- 2. Acquisition of Site: The site was taken via tax title by the City of Gardner in March 2010, then conveyed to the Gardner Redevelopment Authority in July 2012 to aid in the Gardner Redevelopment Authority's 140 South Main St. Redevelopment Project.
- 3. No Responsible Party for the site: i) The City of Gardner nor the Gardner Redevelopment Authority did not dispense or dispose of petroleum or petroleum product contamination, or exacerbated the existing petroleum contamination of the site ii) The City or GRA did not own the site when any dispensing or disposal of petroleum took place and iii) The GRA took reasonable steps with regard to the contamination at the site.
- 4. <u>Cleaned up by a person not potentially liable</u>: The Gardner Redevelopment affirms that they did not cause or contributed to any release of petroleum substances at the site. The GRA took reasonable steps with regard to the contamination at the site.
- 5. <u>Judgements</u>, <u>Orders</u>, <u>or Third Party Suits</u>: No responsible party including the applicant is identified for the site, through a citizen suit, contribution action, or other third- party claim brought against the current or immediate past owner, that would, if successful, require the assessment, investigation, or cleanup of the site.
- 6. <u>Subject to RCRA</u>: 140 South Main St. is not subject to any order under 9003(h) of the Resource Conservation and Recovery Act (RCRC)/ Solid Waste Disposal Act.
- 7. Financial Viability of Responsible Parties: No responsible party is identified
- 11. <u>Cleanup Authority and Oversight Structure:</u> a. The GRA will procure a Qualified Environmental Professional that will conduct, manage and oversee the cleanup. The site project manager will ensure the (QEP) is in place before cleanup begins and will be acquired via competitive procurement provisions. b. The GRA has been in contact and is familiar with neighboring property owners and will gain access via in person contact, mail, phone or electronic format.
- 12. <u>Community Notification:</u> A public meeting was held November 13<sup>th</sup>, 2019 at 6:00 p.m. in the Mayors Conference room at the City Hall. A public Notification went out via the City's public notice system, posted within the City Hall meeting posts, also via the City's website. A copy of the Draft Analysis of Brownfields Cleanup Alternatives and application were presented. Meeting summary and sign in sheets were recorded.
- 13. <u>Statutory Cost Share:</u> a. The GRA will meet the required Cost Share with the awarded grant funds from MassDevelopment (350K) "Single Site Cleanup." B. No cost share waiver is being requested.

#### b. Past Performance and Accomplishments

#### i. Currently Has or Previously Received an EPA Brownfields Grant:

(1) Accomplishments: The GRA has historically remained in a successful, productive partnership with the EPA including grants awarded and administered outside and prior to the cleanup grant, as the recipient of grants that have provided crucial aid in offsetting costs to relative to environmental remediation at various sites within the city. Past EPA funding has been used for assessment and cleanup with 5 sites being affected and improved by these monies. The S. Bent property EPA Grant for \$200k in 2007, EPA RLF \$750k in 2010, and EPA RLF for \$500k in 2014. The City provided a Hazard Material Loan, in the amount of \$200,000 that assisted in the remediation at the City's new Police Station. In 2016 the GRA received \$340,750 from the Gardner Brownfield Revolving Loan Fund sub grant for the Garbose remediation. The 3 EPA Cleanup grants were granted in 2016 for three parcels (\$200k each parcel) on the former Garbose Metal Facility for a total of \$600,000. The Garbose property is in the final reporting stage for a successful remediation. All reporting for Garbose were reported in ACRES, and all funds were expended.

(2) Compliance with Grant Requirements: The compliance with the work plan, schedule, and terms and conditions under the current/prior grant(s), have all been properly reported and all funds have been expended. The project director has used ACRES, and in house use of spreadsheet tracking and reporting to head of department. Progress was made (and reported on), towards achieving the expected results of the grant(s) in a timely manner. All expected results were reported on. GRA has a list of the past and present EPA grants that demonstrate the history of timely and acceptable quarterly performance and grant deliverable. As well as ongoing ACRES reporting. All grant funds under the current/prior grant(s) have been expended by the end of the period of performance.



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

# Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker Governor

Karyn E. Polito Lieutenant Governor Kathleen A. Theoharides Secretary

> Martin Suuberg Commissioner

October 15, 2019

U.S. EPA New England Brownfields Project Officer Attn: Chris Lombard 5 Post Office Square, Suite 100 Boston, MA 02109-3912

Subject:

STATE PETROLEUM ELIGIBILITY DETERMINATION

140 South Main Street, Gardner, Massachusetts

Dear Ms. Lombard:

The Massachusetts Department of Environmental Protection (MassDEP) has been requested by the Gardner Redevelopment Authority (the "GRA") to make a determination as to whether the property listed above ("site" or "property") meets the definition of a Brownfield site and whether it is eligible to use U.S. Environmental Protection Agency (EPA) Brownfields Cleanup Grant funding, for which an application is being submitted under EPA's FY20 Brownfields Cleanup Grant round. The site is currently owned by the GRA, which acquired the property from the City of Gardner in 2012. The City of Gardner took ownership of the property due to tax taking prior to that. Contamination likely occurred between the 1930s and the 1980s, when the property was used for various petroleum-type businesses. GRA's intent is to remediate the property and then market it for redevelopment.

Between the 1930s and the 1980s, the site was occupied by a fuel dealer that dispensed heating oil, kerosene, gasoline, and lubricating oil; later, it was used as an automotive repair business. In 1986, eleven underground storage tanks (USTs) and several above ground storage tanks (ASTs) were removed from the property. Environmental investigations at the property have shown that petroleum-impacted soil and groundwater, as well as an area near the Greenwood Brook, have been impacted. These releases are documented with MassDEP under Release Tracking Numbers (RTNs) 2-0000729, 2-0011463, and 2-0018421.

After a review of available records and the information provided by GRA, MassDEP has compiled the following information:

 Petroleum contamination is present at the site due to former uses and are documented in MassDEP records. The GRA currently owns the property. The immediate previous owner is the City of Gardner, which acquired the property via tax foreclosure, and is therefore <u>not</u>

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

TTY# MassRelay Service 1-800-439-2370
MassDEP Website: www.mass.gov/dep

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<u>viable</u>. Contamination occurred between 1930 and 1980, when neither the current owner nor the immediate previous owner, the City of Gardner, owned the property. Therefore, both GRA and the City of Gardner are considered to be <u>not liable</u>.

- 2. The site is not currently being assessed or cleaned up using Leaking Underground Storage Tank (LUST) funds, nor is it subject to a response under the Oil Spill Act. For these reasons, the site is a "relatively low risk" site as defined by EPA.
- The applicant (GRA) has not dispensed or disposed of, or owned the property, during the dispensing or disposal of petroleum. In addition, the applicant has not exacerbated potential contamination.
- 4. There are no Judgments, Orders, or Third Party Suits that identify and require a responsible party to assess, investigate, or cleanup this property.
- 5. This property is not subject to any order under §9003(h) of the Resource Conservation and Recovery Act (RCRA).

Therefore, based on the above information, MassDEP has determined that the property meets the requirements set forth by the EPA for a **positive petroleum eligibility determination**.

I hope that this information is helpful, and please feel free to contact Angela Gallagher at 508-946-2790 if you have any questions or concerns.

Sincerely,

Paul Locke

Assistant Commissioner, Bureau of Waste Site Cleanup

ec: Trevor Beauregard, Executive Director, Gardner Redevelopment Authority
Maribel Cruz, Economic Development Coordinator, Gardner Redevelopment Authority
Michael LeBlanc, Brownfields Coordinator, DEP-CERO

#### **PUBLIC HEARING**

140 South Main Street Site – EPA Cleanup Grant Application, DRAFT Analysis

Brownfields Cleanup Alternatives, and Public Input

Wednesday, November 13, 2019 at 6:00 PM

Mayor's Conference Room, 95 Pleasant Street, Gardner, MA 01440

The Gardner Redevelopment Authority will host a Public Hearing in relation to the DRAFT Analysis Brownfields Cleanup Alternatives – Preliminary Evaluation for the 140 South Main Street Site, 140 South Main Street, Gardner, MA 01440 (MassDEP. Release Tracking Number: 2-20279 & 2-18421). The Public Hearing will be a forum to present notice of the owner's intention to file an application for an EPA Cleanup Grant to aid in remediation of the property, to present the DRAFT Analysis Brownfields Cleanup Alternatives, and to solicit input and feedback from the community. All are invited to attend on Wednesday, November 13th, 2019 at 6:00 PM in the Mayor's Conference Room, 95 Pleasant Street, Gardner, MA 01440.

Draft documents including the application and Analysis Brownfields Cleanup Alternatives are available for viewing in the Economic Development Office, in Room 202, City Hall Annex, 115 Pleasant Street, Gardner, MA 01440. Additionally comments or feedback can be directed to Department of Community Development and Planning via email to: Maribel Cruz: <a href="mailto:mcruz@gardner-ma.gov">mcruz@gardner-ma.gov</a> or directly to 978-630-4074 ext.1

Your attendance and input are encouraged and welcomed.

CTY CERTS OF E

## **SIGN-IN**

MEETING: 140 S. Main St. Brownfield Cleanup Grant Proposal

DATE & PLACE: Wednesday November 13<sup>th</sup> @ 6:00 p.m.

95 Pleasant St. Gardner, MA City Hall in the Mayor's Conference Room

NAME	AFFILIATION and 18
Maribel Grun	Economie Dev. Coordinator
Duncin BURNS	COM-COM-GARDNIER

#### GARDNER REDEVELOPMENT AUTHORITY

### 115 Pleasant Street, Manca Annex-Room 201 Gardner, MA 01440

Phone: 978-630-4014 Fax: 978-632-1905

# Public Meeting Minutes for FY2020 EPA Brownfield Grant Application regarding 140 South Main Street Gardner Ma. 01440

Meeting Date: November 13th 2019

Time: 6:00 p.m.

<u>Place:</u> Mayors Conference Room City Hall 95 Pleasant St. Gardner Ma. 01440 Attendance: Maribel Cruz Economic Development Coordinator, Duncan Burns

Conservation Commission Member/ Resident

#### **Agenda**

Presentation of Draft Analysis of Brownfields Cleanup Alternatives, Application Meeting started at 6:00 p.m.

Maribel Cruz presented the information from the ABCA.

Duncan Burns asked "Will the retaining wall need to be torn down?

Maribel Cruz responded: "Yes, in order to get to the root of the contamination the retaining wall and soils need to be removed"

Duncan Burns" You recently received the \$350K assessment and cleanup award from MassDevelopment have the funds been utilized?"

Maribel Cruz response" The assessment monies portion of the grant (100K) have been utilized to complete stream testing, wetlands permitting and design phase. The next steps will be the cleanup portion which will go out to bid then we can begin to utilize the remaining 250k of the MassDevelopment grant."

Duncan Burns" I am familiar with the ABCA and the parcel as I live in close proximity to it, I wish you luck with the application as I know it is very competitive" Maribel Cruz "Thank you and I will put in my best effort"

Meeting Adjourned at 6:15 p.m.

#### **Event Details**



### EPA Cleanup Grant Application-Public Hearing

Wednesday, November 13, 2019

The Gardner Redevelopment Authority will host a Public Hearing in relation to the DRAFT Analysis Brownfields Cleanup Alternatives -Preliminary Evaluation for the 140 South Main Street Site. 140 South Main Street, Gardner, MA 01440 (MassDEP. Release Tracking Number: 2-20279 & 2-18421). The Public Hearing will be a forum to present notice of the owner's intention to file an application for an EPA Cleanup Grant to aid in remediation of the property, to present the DRAFT Analysis Brownfields Cleanup Alternatives, and to solicit input and feedback from the community. Draft documents including the application and Analysis Brownfields Cleanup Alternatives are available for viewing in the Economic Development Office, in Room 202, City Hall Annex, 115 Pleasant Street, Gardner, MA 01440. Additionally comments or feedback can be directed to Department of Community Development and Planning via email to: Maribel Cruz: mcruz@gardner-ma.gov or directly to 978-630-4074 ext,1

Date: November 13, 2019

Time: 6:00 PM - 7:00 PM

Location: Mayor's Conference Room

Address: 95 Pleasant Street Gardner, MA 01440

Contact: 978-630-4074 ext.1

Email: Email (mailto:mcruz@gardner-ma.gov)

# DRAFT Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation

Former Bolster Oil Company 140 South Main Street, Gardner, Massachusetts MassDEP Release Tracking Number: 2-00729

# Prepared for the City of Gardner October 2019

#### I. Introduction & Background:

a. Site Description: 140 South Main Street Gardner, Ma. 01440 The Site consists of a 0.22 acres of land off South Main Street (to the east) that is abutted by Greenwood Brook to the south. A residential property off Travers Street abuts the site to the west. The property is currently improved by two single-story buildings consisting of multi-room office area with attached garage. A separate garage on the southern portion of the site (i.e., nearer to Greenwood Brook) was recently demolished. An approximate 13-foot high retaining wall is located along the southern/eastern boundary of the site, separating the site from Greenwood Brook. The remainder of the site is open and paved with asphalt.

The site is not located within a Potentially Productive Aquifer, Sole Source Aquifer, Federal Emergency Management Agency (FEMA) 100-year floodplain, Zone II Area, Interim Wellhead Protection Area, Surface Water Supply Zone A, Area of Critical Environmental Concern, Vernal Pool, or Habitat of Rare Wetland Wildlife. In addition, there are no public or private drinking water supply wells within a 500-foot radius of the property. Wetlands associated with Greenwood Brook, and designated 100-year floodplain areas are located within 500 feet of the Site.

b. Previous Site Use(s): According to previous reports, the site was occupied by a livery company from circa 1900 to 1921, and the site may have been used for residential purposes from 1921 until early 1930s. From the 1930s to the 1980s, the Bolster Oil Company (Bolster) occupied the site. Bolster reportedly distributed petroleum products including gasoline, fuel oil, kerosene, and lubricating oil, and used the property for automotive repair and servicing. In 1986, eleven (11) underground storage tanks (USTs) and an undisclosed number of above ground storage tanks (ASTs) associated with Bolster were removed from the site. Mailman's Steam Cleaning reportedly operated at the site from early 1990 until the mid to late 1990s, and they used the property as office and storage space for equipment only. The site was reportedly occupied by an automotive repair garage from the early 2000s until 2010.

c. Site Assessment findings: Under the Massachusetts Contingency Plan (MCP) regulations, three Release Tracking Numbers (RTNs) have been assigned to site. According to previous site reports, RTNs 2-0729 and 2-11463 are associated with petroleum-impacted soils discovered during a Phase I Environmental Site Assessment in 1990 and a utility repair in 1996, respectively. RTN 2-18421 was also issued to the site in 2011 after MassDEP conducted investigations at the abandoned site. MassDEP discovered light non-aqueous phase liquid (LNAPL – primarily No. 2 fuel oil) in several groundwater monitoring wells on the site, and observed LNAPL seeping from the site's retaining wall and building support wall adjacent Greenwood Brook. Booms and absorbent socks were installed to mitigate the effects of this release, and in 2012 MassDEP listed RTN 2-18421 as being addressed (i.e., linked) under the site's primary RTN 2-0729.

In February 2013, another environmental consultant prepared an Analysis of Brownfield Cleanup Alternatives (ABCA) and Phase III - Remedial Action Plan for the site, supported by a sub-grant to the GRA provided through the City's Brownfields Revolving Loan Fund (RLF). Following that work, that consultant submitted a MCP Release Abatement Measure (RAM) Plan to MassDEP under site RTN 2-0729 in July 2014. Prior to conducting the RAM work, the garage building on the southern portion of the site was demolished. Under the RAM Plan, a former hydraulic lift in the remaining building garage area was removed, and contaminated soil was excavated beneath this former lift area to approximately 10 feet below grade. A total of 5 cubic yards of contaminated soils was generated for off-site disposal during this work. Contaminated soil excavation also occurred on the exterior portion of the site in the area of the recently demolished garage, to the north of the retaining wall. This excavation occurred to approximately 14 feet below grade, and approximately 900 tons of contaminated soils were generated from this excavation work for off-site disposal. During this RAM work, contaminated soil excavation did not occur below the groundwater table, and the groundwater/LNAPL issue was not treated. A RAM completion report was filed for RTN 2-0729 in May 2015. Post-RAM Site Assessment Findings: Postexcavation confirmatory soil sampling indicated that elevated concentrations of petroleum-related compounds remain in a base (bottom) sample collected from the former hydraulic lift excavation area, and in five of the confirmatory samples collected from the larger excavation area. The confirmatory sample with the highest concentrations was collected along the bottom of the excavation near retaining wall. Gauging of LNAPL in groundwater did not occur as part of RAM (monitoring wells need to be replaced), but it is assumed that LNPAL is still present because groundwater treatment did not occur.

d. **Project Goal:** The project goal is to remove the retaining wall/former garage building foundation, conduct additional contaminated soil excavation at depths near and below the groundwater table (specifically nearer to and up to the bank of Greenwood Brook) for off-site disposal. Remove the LNAPL in groundwater issues, and complete bank restoration. These actions should further reduce or eliminate LNAPL seepage into the abutting resource area (i.e., brook). Following site remediation, the City plans to market the property for mixed commercial reuse.

#### II. Applicable Regulations and Cleanup Standards:

- a. Cleanup Oversight Responsibility: As the current owner, GRA is the "Responsibility Party" for addressing cleanup for site RTN 2-0729. The City's environmental consultant / Licensed Site Professional (LSP; a hazardous waste site cleanup professional in Massachusetts) for the project will be responsible cleanup oversight and reporting to MassDEP on behalf of GRA in accordance with the MCP.
- b. Cleanup Standards for major contaminants: The MCP describes two basic approaches (a constituent- specific approach and a cumulative risk approach) and three methods (Method 1, Method 2, and Method 3) for evaluation of risk. In a Method 1 Risk Characterization, soil and groundwater exposure point concentrations are compared to applicable Method 1 Cleanup Standards. A Method 2 Risk Characterization supplements and modifies the MCP Method 1 standards with site and constituent-specific information. Method 2 can be used to modify existing Method 1 Standards and/or to derive additional standards for those constituents for which Method 1 standards have not been promulgated and can also account for site-specific fate and transport mechanisms. A Method 3 Risk Characterization is a cumulative, site-specific risk approach that includes assessment of the impacts to identified human and ecological receptors, as well as characterizing the risk of harm to safety and public welfare. This method is used when environmental media (e.g., sediment, surface water) other than, or in addition to soil and groundwater have been identified as media of concern due to contamination by a release.
- c. Laws & Regulations Applicable to the Cleanup: Laws and regulations that are applicable to this cleanup project include the MCP for site release RTN 2-0729, the Federal Davis-Bacon Act, and wetlands permitting under Massachusetts Wetlands Protection Act (310 CMR 10.00). Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed. In addition, all appropriate permits (e.g., notify before you dig, soil transport/disposal manifests) will be obtained prior to the work commencing.

#### III. Evaluation of Cleanup Alternatives:

- a. Cleanup Alternatives Considered: To address contamination at the Site, three different alternatives were considered, including Alternative #1: No Action and/or Monitored Natural Attenuation (MNA) Alternative #2: Excavation with Offsite Disposal; and Alternative #3: In-Situ Remediation.
- b. Cost Estimate of Cleanup Alternatives: To satisfy MCP requirements, the effectiveness, implementation, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

<u>Effectiveness</u>: Alternative #1: Although a significant volume of the petroleum "source" soils were previously excavated and disposed off-site, there is still a LNAPL in groundwater issue that is/has migrated toward the abutting brook, which presents unacceptable levels of risks to the environment at the site. Therefore, this option alone cannot be evaluated in detail. Alternative #2: Excavation with off-site disposal is an effective way to eliminate risk at the site, since contamination will be removed and the exposure pathways will no longer

exist. In addition, dewatering will need to occur as part of contaminated soil excavation work below the groundwater table, which will allow for treatment of groundwater and off-site disposal of separate phase petroleum product.

Furthermore, the demolition/removal of the retaining wall in areas not structurally connected to abutting properties will allow for further access to the deeper contaminated soils and better access to the contaminated soils outside of the wall, adjacent to/along the brook bank. Alternative #3: In-situ treatment of soils and groundwater impacted by petroleum compounds can be an efficient/cost effective and less intrusive approach for site cleanup. However, it is typically not effective for use on LNAPL (it is more applicable for dissolved-phase petroleum impacts in groundwater), and in-situ injections of remedial additives may further exasperate the migration of the plume towards/into the abutting brook.

Implement ability: Both Alternatives #2 and #3 can readily be implemented at the site. However, as noted, in-situ remedial injections (Alternative #3) may further exasperate the migration of the plume towards/into the abutting brook, and therefore would only be implemented with restrictions on injection rates and monitoring requirements within the abutting brook. As noted above, the removal of the retaining wall will further enhance the implementation of Alternative #2.

Cost: For Alternative #2: The estimated costs for this alternative is between \$175,000 and \$240,000, which includes costs for project permitting, engineering design, sampling, and MCP reporting, as well as for retaining wall demolition, contaminated soils removal (with dewatering and treatment), off-site disposal of contaminated media, and slope restoration. Alternative #3: The estimated costs for this alternative are between \$50,000 and \$75,000, but as indicated, it may not adequately address the LNAPL in groundwater issue, and does not address impacts to the bank of the brook.

c. Recommended Cleanup Alternative: To pursue regulatory closure without added restrictions on the property (no Activity and Use Limitation), the measurable LNAPL in on-site wells must be eliminated. Approaches to LNAPL removal at this site would include additional soil excavation in the area of the retaining wall. Since the retaining wall is no longer considered a load bearing, functional retaining wall, sections of the wall will be removed to allow for soil excavation and the area could be restored by grading the site down towards Greenwood Brook. During this proposed option, LNAPL will be pumped out during the dewatering of the excavation area, and the free-phased product will also be disposed off-site. Also during this proposed option, the residual petroleum impacted soil along the Greenwood Brook bank will also be excavated as necessary.

OMB Number: 4040-0004 Expiration Date: 12/31/2019

Application for	Federal Assista	ance SF	-424			
* 1. Type of Submiss  Preapplication  Application  Changed/Corre		Ne □ Co	e of Application: ew ontinuation evision		Revision, select approp	priate letter(s):
* 3. Date Received: 12/02/2019	: 4. Applicant Identifier: Gardner Redevelopment Authorit				Authorit	
5a. Federal Entity Ide	entifier:			;	5b. Federal Award Ide	entifier:
State Use Only:				<u> </u>		
6. Date Received by	State:		7. State Application	Ide	entifier: Choose Sta	ate
8. APPLICANT INFO	ORMATION:					
* a. Legal Name: G	ARDNER REDEVEL	JOPMENT	AUTHORITY			
* b. Employer/Taxpa	yer Identification Nu	mber (EIN	I/TIN):	I r	* c. Organizational DU	JNS:
d. Address:						
* Street1:	115 PLEASANT	ST				
Street2:	ROOM 202					
* City:	GARDNER					
County/Parish:	Worcester					
* State:					MA: Massachus	setts
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* Country:					USA: UNITED ST	TATES
* Zip / Postal Code:	01440-2610					
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f. Name and contac	ct information of p	erson to	be contacted on m	atte	ers involving this ap	pplication:
Prefix: Mis	ss		* First Nam	e:	Maribel	
Middle Name:						
* Last Name: Cru	1Z					
Suffix:						
Title: Economic I	Development Co	ordinat	or			
Organizational Affilia	tion:					
City of Gardne	r					
* Telephone Number	9786304074				Fax Number	er:
* Email: mcruz@ga	ardner-ma.gov					

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
Q: For-Profit Organization (Other than Small Business)
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
Environmental Protection Agency
11. Catalog of Federal Domestic Assistance Number:
66.818
CFDA Title:
Brownfields Assessment and Cleanup Cooperative Agreements
* 12. Funding Opportunity Number:
EPA-OLEM-OBLR-19-07
* Title:
FY20 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Delete Attachment View Attachment
Add Attachment Solete Attachment
* 15. Descriptive Title of Applicant's Project:
140 South Main Street Gardner MA 01440 Petroleum Cleanup
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application for Federal Assistance SF-424									
16. Congressional	Districts Of:								
* a. Applicant	A-3rd			* b. Program/Project	MA-3rd				
Attach an additional	ist of Program/Project Congr	ressional Districts	if needed.						
			Add Attachment	Delete Attachment	View Attachment				
17. Proposed Proje	ect:								
* a. Start Date: 06	/01/2020			* b. End Date:	06/01/2023				
18. Estimated Fund	ling (\$):								
* a. Federal		200,000.00							
* b. Applicant		10,000.00							
* c. State		5,000.00							
* d. Local		5,000.00							
* e. Other		15,000.00							
* f. Program Income		5,000.00							
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* 20. Is the Applica	nt Delinquent On Any Fed	deral Debt? (If "	Yes," provide expla	nation in attachment.)					
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If "Yes", provide ex	planation and attach								
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